

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICHARD ROGERS, individually and on
behalf of similarly situated individuals,

Plaintiff,

v.

BNSF RAILWAY COMPANY,

Defendant.

No. 19-cv-03083

Hon. Matthew F. Kennelly

**INDEX OF EXHIBITS TO PLAINTIFF’S L.R. 56.1 RESPONSE TO DEFENDANT’S
STATEMENT OF MATERIAL FACTS AND ADDITIONAL STATEMENT OF
MATERIAL FACTS IN OPPOSITION TO DEFENDANT’S MOTION FOR SUMMARY
JUDGMENT**

Exhibit	Description
1	Deposition of Carlos Reyes of Defendant
2	Deposition of Timothy Ash of Remprex, LLC
3	Deposition of Remy Diebes of Remprex, LLC
4	Master Agreement between Defendant and Remprex, LLC
5	Remprex, LLC Clerk Console Reference Manual
6	Deposition of Jim Pang of Defendant
7	Deposition of Scott Urban of Nascent, LLC
8	Deposition of Douglas Gruben of Defendant
9	Email Exhibit Demonstrating Intraorganizational “Change Order” System
10	AG System Daily Report for BNSF’s Logistics Park Chicago Location
11	Declaration of Plaintiff’s Expert Joseph Caruso
12	Email Exhibit Demonstrating Failed Centralization Effort
13	May 7, 2021 Expert Report of Global Digital Forensics, Plf’s 26(a)(2) Expert
14	Defendant’s 2017 Corporate Policy on Confidential Information
15	Deposition of Plaintiff Richard Rogers
16	Email Exhibit Wherein BNSF Requests and Receives Biometric Information
17	Email Exhibit Wherein Remprex asks BNSF to Disable AG System Biometrics
18	Weekly AG System Efficiency Report Sent to BNSF
19	RailPASS Application Slideshow for BNSF’s Smartphone App.
20	Defendant’s 2014 Corporate Policy on Confidential Information
21	Defendant’s 2015 Corporate Policy on Confidential Information
22	Email Exhibit Wherein BNSF Director of Hub Operations Asks Remprex how Biometrics are Stored and Secured

Dated: November 11, 2021

Respectfully submitted,

RICHARD ROGERS, individually and on behalf of
a class of similarly situated individuals

By: /s/ David L. Gerbie
One of Plaintiff's Attorneys

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